

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

STUDENT DOE No. 1,	:	
	:	
Plaintiff,	:	CIVIL ACTION
	:	No. 2:25-cv-01962-CMR
	:	
v.	:	
	:	
KRISTI NOEM, in her official capacity as	:	
Secretary of Homeland Security; the U.S.	:	
DEPARTMENT OF HOMELAND	:	
SECURITY; and TODD LYONS, in his	:	
Official capacity as Acting Director of	:	
U.S. Immigration and Customs	:	
Enforcement	:	
	:	
Defendants.	:	

ORDER

AND NOW, this _____ day of _____, 2025, upon consideration of Defendants' motion for leave to file a memorandum of law exceeding fifteen pages, it is hereby **ORDERED** that the motion is **GRANTED**. The Court will accept as filed (ECF No. 21) Defendants' memorandum of law in opposition to Plaintiff's motion for a temporary restraining order.

BY THE COURT:

CYNTHIA M. RUFÉ, J.

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DEPARTMENT OF HOMELAND	:	
SECURITY; and TODD LYONS, in his	:	
Official capacity as Acting Director of	:	
U.S. Immigration and Customs	:	
Enforcement	:	
	:	
Defendants.	:	

**DEFENDANTS' MOTION FOR LEAVE TO FILE
A BRIEF AND MEMORANDUM OF LAW EXCEEDING FIFTEEN PAGES**

For the reasons set forth in the accompanying memorandum of law,
Defendants respectfully request that the Court enter the accompanying order
granting leave to Defendants to file a memorandum of law that exceeds 15 pages
but shall not exceed 25 pages.

Date: April 24, 2025

Respectfully submitted,

DAVID METCALF
United States Attorney

/s/ Anthony St. Joseph
ANTHONY ST. JOSEPH
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**IN THE UNITED STATES DISTRICT COURT
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Plaintiff,	:	CIVIL ACTION
	:	No. 2:25-cv-01962-CMR
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KRISTI NOEM, in her official capacity as	:	
Secretary of Homeland Security; the U.S.	:	
DEPARTMENT OF HOMELAND	:	
SECURITY; and TODD LYONS, in his	:	
Official capacity as Acting Director of	:	
U.S. Immigration and Customs	:	
Enforcement	:	
	:	
Defendants.	:	

**DEFENDANTS’ MEMORANDUM OF LAW IN SUPPORT OF THEIR
MOTION FOR LEAVE TO FILE
MEMORANDUM OF LAW EXCEEDING TEN PAGES**

Defendants filed a brief and memorandum of law in opposition to the Plaintiffs Motion for a Temporary Restraining Order (TRO). *See* ECF No. 21. Defendants respectfully request the Court grant the Defendants leave to file a motion of law that exceeds fifteen pages, but which is no longer than twenty-five pages.

This Court’s Policies and Procedures limit memoranda of law to 15 pages, absent leave. Policies and Procedures for Judge Cynthia Rufe, Civil Matters, part 6.

Additional pages are necessary to fully present the background, history, and purpose of the immigration record—called SEVIS—that is the subject of Plaintiff’s

Motion for TRO. Plaintiff contends that his SEVIS record has been terminated improperly. *See* ECF No. 8.

In their brief, Defendants explain the background and purpose of the SEVIS record. It requires more than 15 pages to adequately provide that background, along with the relevant case law and statutory support. Consequently, Defendants request that they be permitted an additional 10 pages (*i.e.*, that the page limit be increased from 15 to 25 pages) for its memorandum of law in opposition to Plaintiff's TRO motion.

WHEREFORE, Defendants respectfully request that the Court enter the accompanying order granting Defendants leave to file a memorandum of law exceeding 15 pages.

Dated: April 24, 2024

/s/ Anthony St. Joseph
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CERTIFICATE OF SERVICE

I hereby certify that on this date the foregoing Motion for Leave to Exceed Page Limits was filed electronically through the Court's CM/ECF system, which will send notice to all attorneys of record.

Dated: April 24, 2025

/s/ Anthony St. Joseph
ANTHONY ST. JOSEPH
Assistant United States Attorney